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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAMON MALDONADO, JR.,

Defendant.

CASE NO. 1:23-CR-169 JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT

DATE: August 21, 2024

TIME: 1:00 p.m.

COURT: Hon. Sheila K. Oberto

STIPULATION

1. By previous order, this matter was set for status on August 21, 2024.
2. By this stipulation, defendants now move to continue the status conference to October 16, 2024, and to exclude time between August 21, 2024, and October 16, 2024, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Counsel for defendant MALDONADO desires additional time to review the plea agreement with the defendant and consider additional supplemental discovery recently produced.
 - b) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
 - c) The government does not object to the continuance.
 - d) Based on the above-stated findings, the ends of justice served by continuing the

case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 21, 2024 to October 16, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 14, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ KAREN A. ESCOBAR
KAREN A. ESCOBAR
Assistant United States Attorney

Dated: August 14, 2024

/s/ Alekxia L. Torres Stalling
Alekxia L. Torres Stalling
Counsel for Defendant
Ramon Maldonado, Jr.

ORDER

Pursuant to the Minute Order (doc. 41) issued on August 6, 2024, counsel were directed "to meet and confer and select a mutually convenient trial date" or "to set the matter for a change of plea hearing before District Judge Thurston" (*original emphasis*) pursuant to a stipulation that states "that a Plea Agreement has been filed."

1 The parties have neither selected a trial date nor filed a signed plea agreement. Accordingly, the
2 parties' stipulation for a continuance of the status conference is DENIED.

3
4 IT IS SO ORDERED.

5 Dated: August 14, 2024

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE